

Docket No. SA-532

Exhibit No. 6-S

NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

Excerpt from FAA Document: "Section-by-Section Discussion
of Proposed Changes to Qualification, Service, and Use of
Crewmembers and Aircraft Dispatchers"
(FAA Docket 2008-0677)

(5 Pages)

**Section-by-Section discussion of proposed changes to
Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers**

Minor editorial changes were made for consistency with other sections of the proposed rule.

Proposed paragraph (d) requires that a person complete new hire training before beginning initial training to establish a good foundation for the aircraft specific information provided during initial training.

Section 121.1371 Training category: Eligibility for transition training.

A flight attendant who has been qualified for at least 180 days and has served in the previous 180 days for that certificate holder is eligible for transition training. Aircraft Operating Experience is not required for each aircraft type when a flight attendant receives transition training. The FAA believes that a qualified flight attendant who has served in the previous 180 days for that certificate holder has had an opportunity to consolidate knowledge and skills, and become familiar with company procedures. Therefore, additional operating experience is not required.

Section 121.1373 Training category requirements: Flight attendant emergency training.

Current § 121.417 contains crewmember emergency training requirements. The FAA is proposing to delete this section and require separate emergency training requirements for flight crewmembers and flight attendants. Under proposed paragraph (a), flight attendant emergency training must include the emergency training requirements in the flight attendant QPS. Emergency training is required for each airplane type, model, and configuration. Proposed paragraph (b) requires a test of the

**Section-by-Section discussion of proposed changes to
Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers**

flight attendant's knowledge about the aircraft type and duty position. Proposed paragraph (c) requires a proficiency test.

Current § 121.417 contains a requirement that each crewmember accomplish performance drills every 24 months. The proposed Flight Attendant QPS requires performance drills every 12 months. This change is proposed because of the increased responsibilities that flight attendants have for managing abnormal and emergency cabin situations. In addition, the change acknowledges the NTSB's statement in its report on efficacy of current flight attendant training programs (Flight Attendant Training and Performance During Emergency Situations, NTSB/SIR-92/02). In that report, the NTSB stated that:

Emergency situations typically require quick, assertive, and decisive action with little time for analysis of the situation. For most flight attendants, the only opportunity to practice skills needed in an emergency is during initial and recurrent training. These skills are perishable, and continuing and effective training is essential for maintaining them.

The increased frequency of performance drills also codifies a highly effective industry practice.

The following is a list of substantive revisions to the current emergency training requirements:

1. Revising training in exit device procedures to require each flight attendant to operate each exit device in the normal and emergency modes. This change is proposed to clarify that an exit device must be operated during training unless it is identical to another exit device for which training has been conducted. It must be identical in weight,

**Section-by-Section discussion of proposed changes to
Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers**

dimensions, appearance (e.g., color, placards, and markings), features, forces, operations, and position of assist space (where the crewmember must stand to operate it). These performance drills provide critical practice in preparing and using an exit device in an emergency evacuation.

2. Revising training requirements for the physiological effects of decompression. (See discussion at § 121.1365 above).

3. Requiring Ditching Survival Drill (Wet Training Environment). The proposed QPS contains the current requirement for a ditching drill, but also requires a wet ditching drill during which flight attendants are required to practice getting into a raft from deep water. The FAA added this requirement because flight attendants need to experience at least once during their training, the difficulty of getting into a life raft from deep water. The proposed rule recognizes that certain training benefits can only be derived from actually boarding a raft and manipulating raft equipment while the raft is in water. This is a one-time requirement to be performed during basic qualification, transition, or recurrent training, whichever initially qualifies the flight attendant for extended overwater operations.

4. Clarifying Emergency Evacuation Egress Slide Drill. The current rule requires each flight attendant to complete emergency training drills during the specified training periods, using those items of installed emergency equipment for each aircraft type in which the flight attendant is to serve. The proposed change clarifies that the installed emergency equipment used to fulfill emergency training performance drill requirements in the Flight Attendant QPS must be the same as the equipment installed on each aircraft type in which the flight attendant will serve.

Section-by-Section discussion of proposed changes to Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers

In both the current and the proposed rule, the intent of the performance drills is for each flight attendant to practice on each piece of installed equipment on each aircraft in which he or she is to become qualified, with the exception of the evacuation slide drill. In the case of the evacuation slide drill, the FAA allows certificate holders to select one installed slide to use during the drill from any aircraft on which the flight attendant is to become qualified. The proposed requirement is consistent with the current training requirement that flight attendants train on equipment that is specific to each aircraft type on which they will serve, but recognizes that some skills are transferable from one type of evacuation slide to another.

When a flight attendant is qualifying on multiple aircraft during basic qualification training, the possibility of sustaining an injury during five or six evacuation slide drills far outweighs the training benefits of performing an evacuation drill for every aircraft on which the flight attendant will serve. Therefore, in the current rule, as well as the proposed rule, the FAA requires flight attendants to perform an evacuation slide drill with only one type of evacuation slide from an aircraft on which the flight attendant will serve.

5. Requiring Emergency Evacuation Egress Drill. The flight attendant must complete the Emergency Evacuation Egress Drill if the flight attendant will be qualified to serve on an aircraft that does not have emergency evacuation slides. The Emergency Evacuation Egress Drill offers a flight attendant the opportunity to practice egressing by a method other than the method used during non-emergency exiting. Therefore, the requirements prohibit the use of “easy” exits, such as those with stairs. The intent of this requirement is to establish a similar level of emergency preparedness for all flight

**Section-by-Section discussion of proposed changes to
Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers**

attendants operating under part 121, regardless of whether or not they are qualified on aircraft with emergency evacuation slides.

If the flight attendant will be qualified to serve on an aircraft with emergency evacuation slides and on an aircraft without emergency evacuation slides, the flight attendant must complete both the Emergency Evacuation Egress Slide Drill and the Emergency Evacuation Egress Drill. This proposal ensures a realistic training environment.

6. Deleting Slide and Raft Transfer Observation Drill. Most modern slides and rafts are door mounted, highly integrated, complex installations. The size and weight of door mounted slides and rafts complicates their portability within the aircraft cabin. The FAA considered how effectively flight attendants could move stowed rafts to exits or move slides and rafts from unusable exits to accessible doorways, even with the help of able-bodied passengers. In addition, the FAA also considered the possibility of inadvertent inflation of the slide or raft assembly during the transfer process.

Many air carriers do not incorporate the transfer of slide and rafts from one door to another into their ditching procedures. However, the FAA does not consider it necessary to require observation and knowledge training on a maneuver that may be difficult and contrary to safety. Therefore, the FAA is removing the requirement for the Slide and Raft Transfer knowledge training and observation drill from the proposed rule.

Section 121.1375 Training category requirements: Flight attendant recurrent training.